

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

THE STATE OF TEXAS; GREG ABBOTT IN
HIS OFFICIAL CAPACITY AS GOVERNOR OF
TEXAS; TEXAS DEPARTMENT OF PUBLIC
SAFETY; STEVEN C. MCCRAW, IN HIS
OFFICIAL CAPACITY AS DIRECTOR OF TEXAS
DEPARTMENT OF PUBLIC SAFETY,

DEFENDANTS.

CASE NO. 1:24-CV-00008-DAE (LEAD CASE)

CONSOLIDATED WITH 1:23-CV-1537-DAE

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT OF PLAINTIFF UNITED STATES**

Defendants State of Texas; Greg Abbott, in his official capacity as Governor of Texas; Texas Department of Public Safety; and Steven C. McCraw, in his official capacity as Director of Texas Department of Public Safety, respectfully request a thirty-day extension to respond to the Complaint of Plaintiff United States in Case No. 1:23-cv-1537, which would otherwise be due April 1, 2024 (per Text Order entered on January 22, 2024). Defendants have conferred with Plaintiff United States concerning this motion, and it is unopposed.

Good cause exists for an extension. Currently, the grant of a preliminary injunction by this Court has been appealed, with proceedings currently ongoing in the U.S. Court of Appeals for the Fifth Circuit. ECF No. 49. Accordingly, extending the time for Defendants to respond to the Complaint of Plaintiff United States by thirty days will conserve the parties' and the Court's resources. A proposed order is attached.

Date: March 19, 2024

Respectfully submitted.

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CERTIFICATE OF CONFERENCE

I certify that I conferred via e-mail with Kuntal Cholera, counsel for Plaintiff United States, on March 19, 2024, who indicated that it is unopposed to this motion.

/s/ Ryan D. Walters
RYAN D. WALTERS

CERTIFICATE OF SERVICE

On March 19, 2024, this document was filed electronically through the Court's CM/ECF system, which automatically serves all counsel of record.

/s/ Ryan D. Walters
RYAN D. WALTERS